

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

STATE OF TEXAS, et al.)	
)	
)	
v.)	No. 6:23-cv-00007
)	
DEPARTMENT OF HOMELAND)	
SECURITY., et al.)	
)	
Defendants.)	

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO EXCEED WORD LIMIT
FOR RESPONSE TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Defendants respectfully request that the Court extend the word limit for Defendants' response to Plaintiffs' Motion for Preliminary Injunction, ECF No. 22, to 18,000 words. Plaintiffs' motion raises numerous complex issues that would be difficult to address under the Court's 5000-word limit for motions. 18,000 words is the same word limit the Court granted for Defendants' response to the motion for preliminary injunction in the Immigration and Customs Enforcement priorities case on the basis that the motion in that case raised a similar number of complex issues. *See Order, Texas v. United States*, No. 6:21-cv-00016 (S.D. Tex. May 18, 2021).

Defendants conferred with counsel for Plaintiffs and Defendant Intervenors, neither of whom oppose this motion. Defendants seek this enlargement for good cause and in the interest of justice, not for delay, and no party will be prejudiced if the word limit is increased. Accordingly, Defendants request that the Court increase the word limit for Defendants' response to 18,000 words.

Date: June 13, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

WILLIAM C. PEACHEY
Director
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/s/ Brian C. Ward
BRIAN C. WARD
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Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on June 13, 2023, I filed this motion through the Court's CM/ECF system, which automatically served it upon all counsel of record.

/s/ Brian C. Ward

BRIAN C. WARD

U.S. Department of Justice

CERTIFICATE CONFERENCE

I certify that on June 12 and 13, 2023, I conferred with counsel for Plaintiffs and Intervenor Defendants, who informed me that they do not oppose this motion.

/s/ Brian C. Ward

BRIAN C. WARD

U.S. Department of Justice